

**FINDING OF NO SIGNIFICANT IMPACT
AND
DECISION RECORD**

UT-063-04-02, UT-060-2005-042

**Moab Fire District Fire Management Plan
Environmental Assessment (EA)**

Based on the analysis of potential environmental impacts in the attached environmental assessment (EA UT-063-04-02, UT-060-2005-042) and consideration of the significance criteria in 40 CFR 1508.27, I have determined that the Moab Fire District Fire Management Plan (FMP) would not result in significant impacts on the human environment. An environmental impact statement (EIS) is therefore not required.

Decision:

The Moab Fire District includes the Moab, Monticello and Price Field Offices. It is my decision to authorize the implementation of the Moab Fire District Fire Management Plan as described in the Proposed Action alternative of EA- UT-063-04-02, UT-060-2005-042 for BLM-administered lands in the Moab and Monticello Field Offices only.

Implementation of fire management decisions for the Price Field Office would not occur until after the Price Field Office RMP Record of Decision is signed (expected 2007). When the Price RMP is completed by the Price Field Office, there will be a separate FONSI / DR authorizing implementation of the Fire Management Plan on lands in that Field Office as long as no substantial changes in conditions apply. If changes in conditions have occurred, additional NEPA analysis may be necessary before a decision is rendered.

Summary of the Selected Alternative:

The selected alternative is the Proposed Action alternative of the EA. The fire and fuels management direction as currently documented in the Support Area's Fire Management Plan would be replaced by new direction outlined in the selected alternative. The decisions in this fire management plan provide criteria to guide implementation-level fire management actions.

The selected alternative emphasizes strategic fire management planning that integrates resource management goals, objectives, and concerns with fire management actions. Further, it emphasizes protection of life and resources through wildland fire and fuels management, and incorporates current scientific principles regarding the benefits of wildland fire in the ecosystem while implementing cost-effective fire management strategies. Management direction is organized within the FMP by 22 land area subdivisions called fire management units (FMUs). The selected alternative describes fire management actions, goals (by acres), and objectives for each FMU. The four fire management activities considered in the selected alternative are:

- Wildland fire suppression – suppression objectives outline the acreage-per-fire-event to which wildland fires will be contained within that FMU; emergency stabilization and rehabilitation (ESR) actions may follow wildland fire suppression

- Wildland fire use – accomplishing specific pre-determined resource management goals with the management of naturally ignited wildfires (for each FMU where wildland fire use has been identified for *potential* use)
- Prescribed fire fuel treatments – the use of prescribed fire would be used to benefit ecosystems and reduce hazardous fuels (after an interdisciplinary review of specific areas for suitability)
- Non-fire fuel treatments – the use of mechanical, chemical, biological, or seeding treatments to benefit ecosystems and reduce hazardous fuels (after an interdisciplinary review of specific areas for suitability)

To protect natural and cultural resources, the selected alternative identifies fire management Resource Protection Measures (see Attachment #1) for the implementation of wildland fire suppression, wildland fire use for resource benefit, prescribed fire and non-fire fuel treatments, and emergency stabilization and rehabilitation actions.

The U.S. Fish and Wildlife Service (FWS) has completed a Biological Opinion on the Proposed Action alternative and Terms and Conditions have been identified in Appendix I, “USFWS Biological Opinion’s Terms and Conditions,” of the EA. The Resource Protection Measures and FWS Terms and Conditions minimize or avoid resource impacts. Therefore, no additional mitigation is necessary because of the protections afforded by the selected alternative. Monitoring of the implementation and effectiveness of the FMP would be conducted through site-specific project planning.

Fire management actions will be evaluated for adherence to this FMP and the associated Resource Protection Measures. Specific monitoring requirements will be followed for prescribed fire (H-9214-I, 1998) and ESR (ESR Handbook, 1999). The extent of monitoring activities may be limited by lack of funding.

Rationale for the Decision:

The decision to authorize the implementation of the Moab Fire District FMP has been made in consideration of the potential environmental impacts of the selected alternative. The selected alternative conforms with BLM planning directives and federal fire management policy, as described in the Federal Wildland Fire Management Policy (1995), Review and Update of the Federal Wildland Fire Management Policy (2001), and A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: Ten-Year Comprehensive Strategy (2001). National fire management direction has evolved in recent years in response to increased fatalities, property loss, local economic disruptions, risk to ecosystems associated with increasingly severe wildland fire seasons, and increasing wildland urban interface conflicts. Federal agencies have been mandated to revise fire management programs to incorporate practices designed to increase protection of human life while decreasing the potential for natural/cultural resource and private property damage.

The selected alternative incorporates these policy changes into the Fire District’s FMP and provides the necessary fire management tools to public land managers across the state to meet resource objectives. This implementation-level plan provides fire management direction that is compliant with national and interagency direction. The FMP documents the fire management program for the Moab Fire District, which is comprised of BLM-administered lands in the Moab, Monticello, and Price Field Offices. The FMP is based on the Utah Land Use Plan Amendment

for Fire and Fuels Management (2005), which amended the Grand (1985) and San Juan (1991) RMPs. FMPs are the fire manager's primary guide for planning and implementing fire-related direction on the ground. FMPs incorporate the broader LUP management direction provided in the Amendment (2005).

The No Action alternative was not selected because it does not meet the purpose and need of the proposed action. The No Action alternative would not conform with national and agency direction for fire and fuels management planning. The No Action alternative would be inconsistent with the land use plans, as amended, because it would continue the implementation of fire management decisions that do not reflect current fire management direction.

This decision takes into consideration the potential environmental impacts that could result from implementation of the FMP. Potential resource conflicts with fire and fuels management actions have been resolved with the incorporation of the Resource Protection Measures and FWS Terms and Conditions. These Resource Protection Measures and FWS Terms and Conditions will minimize or eliminate conflicts or potential impacts associated with the FMP.

This fire management planning process included several opportunities for public participation. A public scoping period was provided in the spring and summer of 2004 (April 2 to July 14, 2004) when the environmental assessment process was initiated, with five public scoping meetings. Comments received during the scoping period helped to finalize the Proposed Action and address resource conflicts. The public was notified of an opportunity to review and comment on the EA from January 16, to February 17, 2006. Two comment letters were received. The EA was slightly modified as a result of the comments and a listing of errata has been prepared. Comments received did not lead to changes in the analysis of the environmental impacts of the proposed amendment. Please see Attachment #2 for the BLM Response to Comments and Errata to the EA.

The BLM has complied with agency and CEQ guidelines for NEPA and public participation. Throughout the development of this EA, no inconsistencies with local, state, tribal, or other federal agency land use plans, policies, or programs were identified or brought to the attention of the BLM. Further, the selected alternative is in compliance with all federal and local laws. There are no known unresolved conflicts or issues with members of the public, organizations, or other agencies related to this FMP.

APPEALS LANGUAGE

The decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR Part 4. Public notification of this decision will be considered to have occurred on the date of signature by the Utah State Director, below. Within 30 days of the decision, a notice of appeal must be filed in the office of the authorized officer at the BLM Utah State Office, Attn: State Director, P.O. Box 45155, Salt Lake City, Utah 84145-0155. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals, Office of Hearings and Appeals, U.S. Department of the Interior, 801 North Quincy St., Suite 300, Arlington, VA 22203 within 30 days after the notice of appeal is filed with the authorized officer.

If you wish to file a petition for stay pursuant to 43 CFR Part 4.21(b), the petition for stay should accompany your notice of appeal and shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of irreparable harm to the appellant or resources if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

If a petition for stay is submitted with the notice of appeal, a copy of the notice of appeal and petition for stay must be served on each party named in the decision from which the appeal is taken, and with the IBLA at the same time it is filed with the authorized officer.

A copy of the notice of appeal, any statement of reasons and all pertinent documents must be served on each adverse party named in the decision from which the appeal is taken and the Office of the Regional Solicitor, U.S. Department of the Interior, 6201 Federal Building, 125 South State Street, Salt Lake City, Utah 84138-1180, not later than 15 days after filing the document with the authorized officer and/or IBLA.

/s/ Gene Terland

Acting State Director

May 4, 2006

Date of signature

Attachment #1:

Resource Protection Measures identified in the Moab Fire District Fire Management Plan EA

Attachment #2:

BLM Response to Comments

Attachment #1: Resource Protection Measures identified in the Moab Fire District Fire Management Plan EA (Appendix D of the EA)

Resource Protection Measure Number	Resource	No Action Alternative	Proposed Action
Air Quality			
A-1	Evaluate weather conditions, including wind speed and atmospheric stability, to predict impacts from smoke from prescribed fires and wildland fire use. Coordinate with Utah Department of Environmental Quality for prescribed fires and wildland fire use. (RX, WFU) (LUP A-1)	Applied in all FMZs	Applies to All FMUs
A-2	When using chemical fuels reduction methods, follow all label requirements for herbicide application. (NF) (LUP A-2)	Applied in all FMZs	Applies to All FMUs
Cultural Resources			
CR-1	Cultural resource advisors should be contacted when fires occur in areas containing sensitive cultural resources. (SUP) (LUP CR-1).	Applied in all FMZs	Applies to All FMUs
CR-2	Wildland fire use is discouraged in areas containing sensitive cultural resources. A Programmatic Agreement is being prepared between the Utah State Historic Preservation Office, BLM, and the Advisory Council to cover the finding of adverse effect to cultural resources associated with wildland fire use. (WFU) (LUP CR-2)		Applies to All FMUs
CR-3	Potential impacts of proposed treatment should be evaluated for compliance with the National Historic Preservation Act and the Utah Statewide Protocol. This should be conducted prior to the proposed treatment. (RX, NF, ES&R) (LUP CR-3)	Applied in all FMZs	Applies to All FMUs
Invasive, Non-Native Species			
INV-1	In areas known to have weed infestations, aggressive action should be taken in rehabilitating firelines, seeding and follow-up monitoring and treatment to reduce the spread of noxious weeds. Monitor burned areas and treat as necessary. All seed used would be tested for purity and for noxious weeds. Seed with noxious weeds would be rejected (ROD 13 Western States Vegetation Treatment EIS 1991). (SUP, WFU, RX, NF, ES&R) (LUP V-2)		Applies to All FMUs
Threatened, Endangered, or Candidate Species (plants and animals)			
END-1	Initiate emergency Section 7 consultation with United States Fish and Wildlife Service (USFWS) upon the determination that wildfire suppression may pose a potential threat to any listed threatened or endangered species or adverse modification of designated critical habitat. (SUP) (LUP SSS-1)	Applied in all FMZs	Applies to All FMUs
END-2	Prior to planned fire management actions, survey for listed threatened and endangered and non-listed sensitive species. Initiate Section 7 consultation with USFWS as necessary if proposed project may affect any listed species. Review appropriate management, conservation and recovery plans and include recovery plan direction into project proposals. For non-listed special status plant and animal species, follow the direction contained in the BLM 6840 Manual (BLM 1996). Ensure that any proposed project conserves non-listed sensitive species and their habitats and ensure that any action authorized, funded or carried out by BLM does not contribute to the need for any species to become listed. (RX, NF, ES&R) (LUP SSS-2).	Applied in all FMZs	Applies to All FMUs

Resource Protection Measure Number	Resource	No Action Alternative	Proposed Action
END-3	See site-specific conservation measures that would be identified in the Biological Assessment. See Appendix I for a list of binding Terms and Conditions as provided in the USFWS's Biological Opinion. (SUP, WFU, RX, NF, ES&R) (LUP SSS-3)	Applied in all FMZs	Applies to All FMUs
END-4	Prioritize wildfire suppression in sagebrush habitat with emphasis on minimizing wildfire size and frequency where Gunnison sage-grouse habitat objectives would not be met if a fire occurs.		Applies to All FMUs
Wastes (hazardous or solid)			
HW-1	Recognize hazardous wastes and move fire to a safe distance from dumped chemicals, unexploded ordnance, drug labs, wire burn sites or any other hazardous wastes. Immediately notify BLM field office hazmat coordinator or state hazmat coordinator upon discovery of any hazardous materials, following the BLM hazardous materials contingency plan. (SUP, WFU, RX, NF, ES&R) (LUP HW-1).	Applied in all FMZs	Applies to All FMUs
Water Quality (drinking/ground)			
SW-1	When using chemical fuel reduction treatments follow all label directions, additional mitigations identified in project NEPA evaluation and the Approved Pesticide Use Proposal. At a minimum, provide a 100-foot-wide riparian buffer strip for aerial application, 25 feet for vehicle application and 10 feet for hand application. Any deviations must be in accordance with the label. Herbicides would be applied to individual plants within 10 feet of water where application is critical (BLM ROD 13 Western States Vegetation Treatment EIS 1991). (NF) (LUP SW-6)	Applied in all FMZs	Applies to All FMUs
SW-2	Suppress wildfires consistently with compliance strategies for restoring or maintaining the restoration of water quality impaired [303(d) listed] waterbodies. Do not use retardant within 300 feet of waterbodies. (SUP, WFU) (LUP SW-9)	Applied in all FMZs	Applies to All FMUs
SW-3	Plan and implement projects consistent with compliance strategies for restoring or maintaining the restoration of water quality impaired [303(d) listed] waterbodies. Planned activities should take into account the potential impacts on water quality, including increased water yields that can threaten fisheries and aquatic habitat; improvements at channel crossings; channel stability; and downstream values. Of special concern are small headwaters of moderate to steep watersheds; erosive or saline soils; multiple channel crossings; at-risk fisheries; and downstream residents. (RX, NF, ES&R) (LUP SW-10)	Applied in all FMZs	Applies to All FMUs
Riparian-wetlands Area			
WET-1	Avoid heavy equipment in riparian-wetlands areas. During fire suppression or wildland fire use, consult a resource advisor before using heavy equipment in riparian-wetlands areas. (SUP, WFU, RX, NF, ES&R) (LUP SW-7)		Applies to All FMUs
WET-2	Limit ignition within native riparian-wetlands areas. Allow low-intensity fire to burn into riparian areas. (RX) (LUP SW-8)		Applies to All FMUs
Wilderness/Wilderness Study Areas			
WILD-1	The use of earth-moving equipment must be authorized by the field office manager. (SUP, WFU, RX, ES&R) (LUP WILD-1).	Applied in all FMZs	Applies to All FMUs

Resource Protection Measure Number	Resource	No Action Alternative	Proposed Action
WILD-2	Fire management actions would rely on the most effective methods of suppression that are least damaging to wilderness values, other resources and the environment, while requiring the least expenditure of public funds. (SUP, WFU) (LUP WILD-2).	Applied in all FMZs	Applies to All FMUs
WILD-3	A resource advisor should be consulted when fire occurs in Wilderness and WSA. (SUP, WFU) (LUP WILD-3).	Applied in all FMZs	Applies to All FMUs
Rangeland Health Standards and Guidelines			
R-1	Rangelands that have been burned, by wildfire, prescribed fire or wildland fire use, would be ungrazed for a minimum of one complete growing season following the burn. (SUP, WFU, RX) (LUP LG-2).	Applied in all FMZs	Applies to All FMUs
R-2	Rangelands that have been re-seeded or otherwise treated to alter vegetative composition, chemically or mechanically, would be ungrazed for a minimum of two complete growing seasons. (RX, NF, ES&R) (LUP LG-3).	Applied in all FMZs	Applies to All FMUs
Livestock Grazing			
LG-1	Coordinate with permittees regarding the requirements for non-use or rest of treated areas. (SUP, WFU, RX, NF, ES&R) (LUP LG-1).	Applied in all FMZs	Applies to All FMUs
Woodlands & Forestry			
WF-1	Planned projects should be consistent with HFRA Section 102(e) (2) to maintain or contribute to the restoration of old-growth stands to a pre-fire suppression condition and to retain large trees contributing to old-growth structure. (SUP, WFU, RX, NF) (LUP F-1)		Applies to All FMUs
WF-2	During planning, evaluate opportunities to utilize forest and woodland products prior to implementing prescribed fire activities. Include opportunities to use forest and woodland product sales to accomplish non-fire fuel treatments. In forest and woodland stands, consider developing silvicultural prescriptions concurrently with fuels treatment prescriptions. (RX, NF) (LUP F-2)		Applies to All FMUs
Vegetation			
V-1	When restoring or rehabilitating disturbed rangelands, non-intrusive, non-native plant species are appropriate for use when native species: (1) are not available; (2) are not economically feasible; (3) cannot achieve ecological objectives as well as non-native species; and/or (4) cannot compete with already established native species (Noxious Weeds Executive Order 13112 2/3/1999; BLM Manual 9015; BLM ROD 13 Western States Vegetation Treatment EIS 1991). (RX, NF, ES&R) (LUP V-1)	Applied in all FMZs	Applies to All FMUs
Fish and Wildlife			
FW-1	Avoid treatments during nesting, fawning, spawning, or other critical periods for wildlife or fish. (RX, NF, ES&R) (LUP FW-1)	Applied in all FMZs	Applies to All FMUs
FW-2	Avoid if possible or limit the size of, wildland fires in important wildlife habitats such as, mule deer winter range, riparian and occupied sage grouse habitat. Use resource advisors to help prioritize resources and develop wildland fire situation analyses and wildland fire implementation plans (WFIPs) when important habitats may be impacted. (SUP, WFU) (LUP FW-2)	Applied in all FMZs	Applies to All FMUs

Resource Protection Measure Number	Resource	No Action Alternative	Proposed Action
FW-3	Minimize wildfire size and frequency in sagebrush communities where sage grouse habitat objectives would not be met if a fire occurs. Prioritize wildfire suppression in sagebrush habitat with an understory of invasive, annual species. Retain unburned islands and patches of sagebrush unless there are compelling safety, private property and resource protection or control objectives at risk. Minimize burn-out operations (to minimize burned acres) in occupied sage-grouse habitats when there are no threats to human life and/or important resources. (SUP) (LUP FW-3).		Applies to All FMUs
FW-4	Establish fuel treatment projects at strategic locations to minimize size of wildfires and to limit further loss of sagebrush. Fuel treatments may include greenstripping to help reduce the spread of wildfires into sagebrush communities. (RX, NF) (LUP FW-4).		Applies to All FMUs
FW-5	Use wildland fire to meet wildlife objectives. Evaluate impacts to sage grouse habitat in areas where wildland fire use for resource benefit may be implemented. (WFU, RX) (LUP FW-5).		Applies to All FMUs
FW-6	Create small openings in continuous or dense sagebrush (>30% canopy cover) to create a mosaic of multiple-age classes and associated understory diversity across the landscape to benefit sagebrush-dependent species. (WFU, RX, NF) (LUP FW-6).	Applied in all FMZs	Applies to All FMUs
FW-7	On sites that are currently occupied by forests or woodlands, but historically supported sagebrush communities, implement treatments (fire, cutting, chaining, seeding etc.) to re-establish sagebrush communities. (RX, NF) (LUP FW-7).	Applied in all FMZs	Applies to All FMUs
FW-8	Evaluate and monitor burned areas and continue management restrictions until the recovering and/or seeded plant community reflect the desired condition. (SUP, WFU, RX, ES&R) (LUP FW-8).	Applied in all FMZs	Applies to All FMUs
FW-9	Utilize the Emergency Stabilization and Rehabilitation program to apply appropriate post-fire treatments within crucial wildlife habitats, including sage grouse habitats. Minimize seeding with non-native species that may create a continuous perennial grass cover and restrict establishment of native vegetation. Seed mixtures should be designed to re-establish important seasonal habitat components for sage grouse. Leks should not be re-seeded with plants that change the vegetation height previously found on the lek. Forbs should be stressed in early and late brood-rearing habitats. In situations of limited funds for ES&R actions, prioritize rehabilitation of sage grouse habitats. (ES&R) (LUP FW-9).	Applied in all FMZs	Applies to All FMUs
Soils			
S-1	Avoid heavy equipment use on highly erosive soils (soils with low soil loss tolerance), wet or boggy soils and slopes greater than 30%, unless otherwise analyzed and allowed under appropriate NEPA evaluation with implementation of additional erosion control and other soil protection mitigation measures. (SUP, WFU, RX, NF, ES&R) (LUP SW-1)		Applies to All FMUs
S-2	There may be situations where high intensity fire would occur on sensitive and erosive soil types during wildland fire, wildland fire use or prescribed fire. If significant areas of soil show evidence of high-severity fire, then evaluate area for soil erosion potential and downstream values at risk and implement appropriate or necessary soil stabilization actions such as mulching or seeding to avoid excessive wind and water erosion. (SUP,	Applied in all FMZs	Applies to All FMUs

Resource Protection Measure Number	Resource	No Action Alternative	Proposed Action
	WFU, RX) (LUP SW-2)		
S-3	Complete necessary rehabilitation on firelines or other areas of direct soil disturbance, including but not limited to waterbarring firelines, covering and mulching firelines with slash, tilling and/or subsoiling compacted areas, scarification of vehicle tracks, OHV closures, seeding and/or mulching for erosion protection. (SUP, WFU, RX) (LUP SW-3)	Applied in all FMZs	Applies to All FMUs
S-4	When using mechanical fuels reduction treatments, limit tractor and heavy equipment use to periods of low soil moisture to reduce the risk of soil compaction. If this is not practical, evaluate sites, post treatment and if necessary, implement appropriate remediation, such as subsoiling, as part of the operation. (NF) (LUP SW-4)	Applied in all FMZs	Applies to All FMUs
S-5	Treatments such as chaining, plowing and roller chopping shall be conducted as much as practical on the contour to reduce soil erosion (BLM ROD 13 Western States Vegetation Treatment EIS 1991). (NF, ES&R) (LUP SW-5)		Applies to All FMUs
Recreation			
REC-1	Wildland fire suppression efforts would preferentially protect Special Recreation Management Areas and recreation site infrastructure in line with fire management goals and objectives. (SUP) (LUP REC-1).	Applied in all FMZs	Applies to All FMUs
REC-2	Vehicle tracks created off of established routes would be obliterated after fire management actions in order to reduce unauthorized OHV travel. (SUP, WFU, RX, NF, ES&R) (REC-2)		Applies to All FMUs
REC-3	Helicopter use during wildland fire should be restricted to a minimum and should avoid canyons as much as possible. (SUP, WFU, RX)		Applies to FMU #14
Geology/Mineral Resources			
M-1	A safety buffer should be maintained between fire management activities and at-risk facilities. (SUP, WFU, RX) (LUP M-1).	Applied in all FMZs	Applies to All FMUs
Paleontology			
P-1	Planned projects should be consistent with BLM Manual and Handbook H-8270-1, Chapter III (A) and III (B) to avoid areas where significant fossils are known or predicted to occur or to provide for other mitigation of possible adverse effects. (RX, NF, ES&R) (LUP P-1).	Applied in all FMZs	Applies to All FMUs
P-2	In the event that paleontological resources are discovered in the course of surface fire management activities, including fires suppression, efforts should be made to protect these resources. (SUP, WFU, RX, NF, ES&R) (LUP P-2).	Applied in all FMZs	Applies to All FMUs
Lands/Access			
LR-1	Fire management practices would be designed to avoid or otherwise ensure the protection of authorized rights-of-way and other facilities located on the public lands, including coordination with holders of major rights-of-way systems within rights-of-way corridors and communication sites. (WFU, RX, NF, ES&R) (LUP LR-1).	Applied in all FMZs	Applies to All FMUs
LR-2	Fire management actions must not destroy, deface, change or remove to another place any monument or witness tree of the Public Land Survey System. (SUP, WFU, RX, NF, ES&R) (LUP LR-2)	Applied in all FMZs	Applies to All FMUs

Resource Protection Measure Number	Resource	No Action Alternative	Proposed Action
<i>Wild Horses and Burros</i>			
WHB-1	Avoid fencing that would restrict access to water. (RX, NF, ES&R) (LUP WHB-1).	Applied in all FMZs	Applies to All FMUs

Attachment #2: BLM Response to Comments

Commenter and comment number	Comment	Response
Mark Belles	Comment is related to the data presented in Appendix C. These FMUs are identified in Appendix C in the “Other Goals and Objectives” column as candidates for wildland fire use: #3 West Benches, #6 San Rafael Desert, #7 Cedar Mountain and #18 Lockhart Basin. Yet all have zero acres identified under the Appendix C column heading “Wildland Fire Use (10 year acreage estimates).” All of these are correctly classified as candidates for wildland fire use. Please include the 10 year estimates for public review and comment.	Appendix C refers to 10-year average acreage estimates for fire management actions. These projections are highly dependent on many factors including budget, changing management goals and objectives, and desired wildland fire condition as well as time and personnel constraints. While some of the FMUs that are candidates for wildland fire use have acres identified, not all of the FMUs have acres identified. We are concentrating time and funds on areas that would most benefit from wildland fire use, therefore, several FMUs contained an estimated zero acreage because they are candidate FMUs but are not expected to have attainable acres within the foreseeable future. Of the four FMUs mentioned in the comment, wildland fire use would not likely be implemented within the next ten year period.
B. Sachau BS-1	Erosion - there is no question that the erosion when trees and vegetation stop holding the soil because they are burned out of existence. The streams are adversely affected with the resultant erosion.	See Ch. 4.2.17 (Soil) and 4.2.9 (Water Quality) of the Environmental Assessment (EA) for analysis of erosion impacts.
BS-2	Birds and wildlife, including endangered species, are injured and die. They cannot escape these fires and some are injured and some die. Since the lands should be held for their protection, this burning is atrocious and horrible.	See Ch. 4.2.16 (Fish and Wildlife) of the EA for discussion of impacts on wildlife, including birds. The U.S. Fish and Wildlife Service, per compliance with Section 7 of the Endangered Species Act, has completed a Biological Opinion on the selected alternative (Sept. 2005). The Biological Opinion identifies measures that reduce impacts to threatened and endangered species. A summary of these measures is presented in Appendix I of the EA.

BS-3	Dropping chemicals to control the fire means that toxic chemicals are dropped onto the land, certainly not helpful to environmental health.	See Ch. 4.2.9 (Water Quality) of the EA for discussion of water quality impacts. Aerial application of fire retardant is considered in Resource Protection Measure SW-2, Appendix D. All FMP actions would follow BLM standard operating procedures regarding aerial application of fire retardant.
BS-4	Burning can sterilize the soil so that nothing at all grows in the future and for a very long time. A burn can represent up to ten years without vegetation - creating a heat island in this time of global warming.	See Ch. 4.2.17 (Soil) and 4.2.15 (Vegetation) for discussion of soil and vegetation impacts.
BS-5	Air pollution -prescribed burning releases fine particulate matter which can and does travel thousands of miles, particularly eastward negatively impacting a great portion of the United States. Such fine particulate matter, which cannot be seen with the naked eye as "smoke" causes lung cancer, pneumonia, heart attacks, strokes, allergies and asthma, among other negative human health effects. Such injury and death to fellow Americans is beyond the pale.	See Ch. 4.2.1 (Air Quality) for discussion of impacts to air quality as stated in the EA. BLM will comply with all federal and state air pollution laws and regulations and will coordinate with the Utah Department of Environmental Quality, Division of Air Quality when implementing fire management actions.
BS-6	Out of control fires are far too frequent. The U.S. has been plagued with them in Oklahoma and Texas this year. New Mexico had an out of control fire last year. We had one on the Delaware River in New Jersey not too long ago. These out of control fires which result from planned burning are extremely expensive and cost the taxpayers millions of dollars. There are many other good reasons NOT to allow this prescribed burning of land. Please consider this my opposition to your plans.	The BLM notes the comment.